

Thomas M. Kennedy
Susan M. Jennik
KENNEDY, JENNICK & MURRAY, P.C.
113 University Place, 7th Floor
New York, New York 10003
Tel: (212) 358-1500
Attorneys for IUE-CWA

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
In re	:
	Chapter 11
	:
General Motors Corporation, <i>et al.</i>	:
	Case No. 09-50026 (REG)
	:
Debtors.	:
	(Jointly Administered)
	X

**EVIDENCE AND WITNESS LIST FOR THE HEARING TO CONSIDER DEBTORS'
MOTION PURSUANT TO 11 U.S.C. §§ 105, 363(b), (f), k), AND (m), AND 365 AND
FED. R. BANKR. P. 2002, 6004, AND 6006, TO (I) APPROVE (A) THE SALE
PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH
VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED
PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND
OTHER INTERESTS; B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF**

TO THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE

The Objecting Unions: the IUE-CWA, United Steelworkers (“USW”) and International Union of Operating Engineers (“IUOE”), hereby identify the following individuals as witnesses whom the Objecting Unions may call at the June 30, 2009 hearing on the Debtors’ Asset Sale Motion (Docket No. 92)¹:

Witness List

1. James Clark
2. Debra Turner

¹ The Objecting Unions reserve their rights to amend or supplement this list should the need present itself.

3. David Hill
4. Dennis Bingham

In addition, the Objecting Unions may use the following physical or documentary evidence at the June 30, 2009 hearing on the Debtors' Asset Sale Motion (Docket No. 92)²

Exhibit List

1. Objection Declaration of James Clark in Support of Objection to Motion to Approve Sale and Exhibits Thereto (Docket No. 1953).
2. Objection Declaration of Debra Turner in Opposition to Motion to Approve Sale Under 11 U.S.C. §363(b) (Docket No. 1956).
3. Declaration of Dennis Bingham and Exhibits Thereto (Docket No. 1948).

Dated: June 25, 2009
New York, NY

Respectfully submitted,

KENNEDY, JENNIK & MURRAY, P.C.
Attorneys for IUE-CWA

By: /s/ Susan M. Jennik
Thomas M. Kennedy
Susan M. Jennik
113 University Place, 7th Floor
New York, New York 10003
(212) 358-1500

² The Objecting Unions reserve their rights to amend or supplement this list should the need present itself.